## **REMARKS**

The Applicants wish to thank the Examiner for thoroughly reviewing and considering the pending application. The Office Action dated June 14, 2005 has been received and carefully reviewed. Claims 1-7 are currently pending. Reexamination and reconsideration are respectfully requested.

The Applicants have amended the specification as noted above. The Applicants submit that the amendments correct minor errors present in the specification.

The Office Action rejected claims 1-4 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent Application Publication No. 2002/0030993 to *Itoh* (hereinafter "*Itoh*"). The Applicants respectfully traverse this rejection.

As required in Chapter 2131 of the M.P.E.P., in order to anticipate a claim under 35 U.S.C. §102, "the reference must teach every element of the claim." The Applicants respectfully submit that *Itoh* does not teach every element recited in claims 1-4. Thus, *Itoh* cannot anticipate these claims. In particular, claim 1 recites a back light unit, comprising, among other features, a plurality of lamps having a first electrode and a second electrode, the electrodes arranged in the lamp housing such "that the first and the second electrodes are alternately disposed in one side of the lamp housing." *Itoh* does not disclose at least this feature. The Office Action alleges that *Itoh* shows "A plurality of lamps [Figure 1:(1)] respectively having a first electrode and a second electrode and arranged in the lamp housing so that the first and the second electrodes are alternately disposed in one side of the lamp housing." *See e.g.*, the Office Action at page 4. The Applicants disagree that *Itoh* discloses this feature. More specifically, while the element having reference numeral 1 in *Itoh* is a lamp, nowhere does *Itoh* disclose electrodes as recited in claim 1. The Applicants have thoroughly reviewed the reference and no where is such disclosure made or even suggested. Accordingly, the Applicants respectfully submit that *Itoh* fails to disclose each

and every element recited in claim 1, and requests that the rejection be withdrawn. Likewise, claims 2-4, which depend from claim 1, are also patentable for at least the same reasons.

The Office Action also rejected claims 5-7 under 35 U.S.C. § 103(a) as being unpatentable over *Itoh* in view of U.S. Patent No. 6,099,134 to *Taniguchi et al.* (hereinafter "*Taniguchi*"). The Applicants respectfully traverse the rejection.

As required in Chapter 2143.03 of the M.P.E.P., in order to "establish prima facie obviousness of the claimed invention, all the limitations must be taught or suggested by the prior art." The Applicants respectfully submit that neither *Itoh* nor *Taniguchi*, either singularly or in combination, disclose or suggest each and every element recited in claims 5-7. More specifically, claim 5 recites a liquid crystal display comprising, among other features, a back light unit with a plurality of lamps having a first electrode and a second electrode and arranged in the lamp housing so that "the first electrode and the second electrode are alternately disposed in one side of the lamp housing." As discussed above, *Itoh* does not disclose this feature. Similarly, *Taniguchi* does not address this shortcoming. Therefore, neither *Itoh* nor *Taniguchi*, either singularly or in combination, disclose or suggest all the features recited in claim 5. The Applicants respectfully submit that claim 5 is patentable over *Itoh* in view of *Taniguchi* under 35 U.S.C. §103(a) and request that the rejection be withdrawn. Likewise, claims 6 and 7, which depend from claim 5, are also patentable for at least the same reasons as discussed above.

The application is in a condition for allowance and favorable action is respectfully solicited. If for any reason the Examiner believes a conversation with the Applicant's representative would facilitate the prosecution of this application, the Examiner is encouraged to contact the undersigned attorney at (202) 496-7500. All correspondence should continue to be sent to the below-listed address.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911.

Respectfully submitted,

Dated: November 14, 2005

Rebecca G. Rudick

Registration No. 41,786

McKENNA LONG & ALDRIDGE LLP

1900 K Street, N.W.

Washington, DC 20006

(202) 496-7500

Attorneys for Applicant